

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

PROGRESSIVE DIRECT INSURANCE
COMPANY d/b/a PROGRESSIVE NORTHERN
INSURANCE COMPANY,
Plaintiff,

v.

Cause No. 1:19-cv-00864 -JHR-LF

MESHA L. GERKEN,
Defendant,

and

MESHA L. GERKEN
Counter-Plaintiff,

v.

PROGRESSIVE DIRECT INSURANCE
COMPANY d/b/a PROGRESSIVE NORTHERN
INSURANCE COMPANY,
Counter-Defendant,

and

MESHA L. GERKEN, BRENDAN STARKEY and
HEATHER STARKEY,
Third-Party Plaintiffs,

v.

DOMENIC CHARLES MILES, and
PROGRESSIVE DIRECT INSURANCE
COMPANY d/b/a PROGRESSIVE NORTHERN
INSURANCE COMPANY,
Third-Party Defendants.

THIRD-PARTY DEFENDANT DOMENIC CHARLES MILES'
NOTICE OF COMPLETION OF BRIEFING

Third-Party Defendant DOMENIC CHARLES MILES, by and through his attorneys, DEGRAAUW LAW FIRM, P.C. (J. Andrew deGraauw and Bryan M. Rowland), respectfully notifies the Court that the Briefing period has expired, and Third-Plaintiffs' have failed to respond to Defendant DOMENIC CHARLES MILES' Motion to Dismiss Third-Party Complaint Due to Violation of the Applicable Statute of Limitations (Doc. 8) filed herein on September 25, 2019.

Respectfully submitted,
DEGRAAUW LAW FIRM, P.C.

By: /s/ **Bryan M. Rowland**
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CERTIFICATE OF SERVICE

I hereby certify that on October 10, 2019, I filed the foregoing pleading electronically through the CM/ECF, which caused all parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

I also hereby certify that on October 10, 2019 the foregoing was e-mailed to the following:

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/s/ **Bryan M. Rowland**

J. Andrew deGraauw
Bryan M. Rowland